

June 21, 2019

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Re: USTelecom Ex Parte Notice, CG Docket No. 17-59, *Advanced Methods to Target and Eliminate Unlawful Robocalls*

Dear Ms. Dortch:

USTelecom recently conducted two ex parte meetings in support of its joint limited Petition for Reconsideration of the Commission's Reassigned Number Database (RNDB).¹ On June 19, 2019, Kristine Fargotstein, Vice President of Policy & Advocacy for USTelecom, Jacquelyne Flemming of AT&T, Philip Linse of CenturyLink, and Glenn Reynolds of iconectiv met with Kris Monteith, Chief, and Lisa Hone, Deputy Bureau Chief, of the Wireline Competition Bureau. On June 20, 2019, Jacquelyne Flemming of AT&T, Philip Linse of CenturyLink, Glenn Reynolds of iconectiv and I met with Jamie Susskind, Chief of Staff to Commissioner Carr.

In both meetings, USTelecom expressed its appreciation for the work that the Commission did to stand up the RNDB and emphasized that the scope of our Petition for Reconsideration is small but important. Specifically, and consistent with our Petition, we are asking the FCC to reconsider its decision to merge the administration of the RNDB with the already consolidated North American Numbering Plan Administrator (NANPA) and Pooling Administrator (PA) functions under a single contract and a single administrator. With this comes a corollary request for flexibility to consider administrator funding scenarios beyond the existing decision to recover the upfront database costs from service providers through the mechanism that is currently used to recover the NANPA and PA costs.

USTelecom explained that our proposal has three primary benefits: (1) it is operationally more efficient; (2) adopting our proposal will be more cost-effective; and (3) adopting our proposal will allow the Commission to stand up the RNDB faster than it could under a combined contract. The group also explored the theory raised in iconectiv's comments questioning whether reconsideration is required because the prospective language at issue may not legally binds the Commission to acquiring the services in the suggested manner.²

¹ Competitive Carriers Association, CTIA, and USTelecom-The Broadband Association Joint Petition for Reconsideration, CG Docket No. 17-59 (filed Apr. 25, 2019).

² Reply Comments of iconectiv in Support of Petition for Reconsideration, CG Docket No. 17-59, 2-7 (filed June 3, 2019).

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Please contact me with any questions.

Sincerely,

_____/s/_____

Mike Saperstein
Vice President, Policy & Advocacy

cc: Kris Monteith
Lisa Hone

Jamie Susskind